

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN DAUBERT,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO. 3:15-cv-00718-ARC
	:	(Judge A. Richard Caputo)
NRA GROUP, LLC d/b/a	:	
NATIONAL RECOVERY AGENCY,	:	
Defendant	:	

**NOTICE OF APPEAL**

Notice is hereby given that NRA Group, LLC d/b/a National Recovery Agency (“NRA”), the Defendant in the above-referenced case, hereby timely appeals to the United States District Court for the Third Circuit from the: (1) Memorandum and Order, entered in this action on May 27, 2016, ECF Docs. 46 and 47, granting Plaintiff summary judgment as to Count II of his Complaint; (2) Memorandum and Order, entered in this action on July 20, 2016, ECF docs. 73 and 74, denying NRA’s Motion for Reconsideration; and (3) Judgment entered in favor of Plaintiff against NRA in the sum of \$34,500 based on alleged violations of the Telephone Consumer Protection Act, entered in this action on August 16, 2016, ECF Doc. 94.

NRA respectfully requests that all documents filed in this case be transmitted with the record on appeal.

FINEMAN KREKSTEIN & HARRIS, P.C.

By: /S/ Richard J. Perr  
RICHARD J. PERR, ESQUIRE  
PA Atty ID No. 72883  
Ten Penn Center  
1801 Market Street, Suite 1100  
Philadelphia, PA 19103-1628  
(v) 215-893-9300; (f) 215-893-8719  
[rperr@finemanlawfirm.com](mailto:rperr@finemanlawfirm.com)  
Attorneys for Defendant

Dated: September 13, 2016

**CERTIFICATE OF SERVICE**

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, by first class mail, postage prepaid, or telecopy on the following:

Carlo Sabatini, Esquire  
Brett M. Freeman, Esquire  
Sabatini Law Firm, LLC  
216 North Blakely Street  
Dunmore, PA 18512  
(v) 570-341-9000; (f) 570-504-2769  
ksecf@bankruptcypa.com; bfecf@bankruptcypa.com  
Attorneys for Plaintiff

/S/ Richard J. Perr  
RICHARD J. PERR, ESQUIRE

Dated: September 14, 2016